

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YOLANDA BEJASA-OMEGA,

X

Docket No.: 07 Civ. 2950 (SWK)
Justice: Hon. Shirley Wohl Kram

Plaintiff,

-v.-

PV HOLDING CORP. and RONALD M. SKLON,

**NOTICE OF ORDER FOR
CONFERENCE PURSUANT TO
RULE 16(b)**

Defendants.

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PLEASE TAKE NOTICE that pursuant to the directive of the Hon. Louis L. Stanton, counsel for the defendants are hereby notified of the ***Order for Conference Pursuant to Rule 16(b)***, a copy of which is annexed hereto.

Dated: New York, New York
May 3, 2007

S A K K A S & C A H N , L L P



By: _____

MATTHEW SAKKAS, ESQ.
Attorney for Plaintiff
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New York, N.Y. 10038
Tel: (212)693-1313
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
YOLANDA BEJASA-OMEGA

Plaintiffs,

ORDER FOR CONFERENCE
PURSUANT TO RULE 16(b)

v.

PV HOLDING CORP. & RONALD M. SKLON

07 Civ. 2950 (LLS)

Defendants

- - - - - X

This action is scheduled for a conference in accordance with Fed. R. Civ. P. 16(b) on Friday, July 13th, 2007 at 2:30 p.m. in Room 21C. The parties must be prepared to discuss, at the conference, the subjects set forth in subdivisions (b) and (c) of Rule 16.

At least a day before the time of the conference, the parties are jointly to prepare and sign, and at the conference they are to submit to me a proposed Scheduling Order, previously signed by counsel and pro se litigants, containing the following:

- (1) the date of the conference and the appearances for the parties;
- (2) a concise statement of the issues as they then appear;
- (3) a schedule including:
 - (a) the names of persons to be deposed and a schedule of planned depositions;
 - (b) a schedule for the production of documents;

- (c) dates by which (i) each expert's reports will be supplied to the adversary side, and (ii) each expert's deposition will be completed;
 - (d) time when discovery is to be completed;
 - (e) the date by which plaintiff will supply his pre-trial order materials to defendant;
 - (f) the date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury trial, or (2) proposed voir dire questions and proposed jury instructions, for a jury trial; and
 - (g) a space for the date for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d), to be filled in by the Court at the conference.
- (4) a statement of any limitations to be placed on discovery, including any protective or confidentiality orders;
 - (5) a statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement;
 - (6) anticipated fields of expert testimony, if any;
 - (7) anticipated length of trial and whether to court or jury;
 - (8) a statement that the Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires;
 - (9) names, address, phone numbers and signatures of counsel; and

*The experts' reports are to set forth not merely the expert's qualifications and conclusions, but also the facts on which the expert relies and the process of reasoning by which the expert's conclusions are reached.

(10) provision for approval of the court and signature line for the court.

If the action is for personal injuries, plaintiff is directed to make a monetary settlement demand and defendant is directed to respond to such demand prior to the conference.

Plaintiff is directed forthwith to notify defendant(s) of the contents of this order, and send a copy of the notification to my chambers.

Dated: May 2, 2007
New York, New York

Louis L. Stanton

LOUIS L. STANTON
U. S. D. J.

AFFIRMATION OF SERVICE

MATTHEW SAKKAS, an attorney duly admitted to practice law before this Court, affirms to the truth of the following under penalty of perjury:

I am not a party to this action, I am over 18 years of age and I reside in New York, New York. On May 3, 2007 I mailed a copy of the within ***NOTICE OF ORDER FOR CONFERENCE PURSUANT TO RULE 16(b)*** to the persons or firms listed below at the following addresses:

Reardon & Sclafani, P.C.
Attorneys for Defendant PV Holding Corp.
Attn.: Michael Sclafani
220 White Plains Road, Suite 235
Tarrytown, NY 10591

Montfort, Healy, McGuire & Salley
Attorneys for Defendant Ronald M. Sklon
Attn.: Hugh Larkin
1140 Franklin Avenue
P.O. Box 7677
Garden City, NY 11530-7677

United States District Court - SDNY
Attn.: Chambers of Hon. Louis Stanton
500 Pearl Street
New York, NY 10007-1312

by enclosing a copy of same in a postpaid properly addressed envelope and depositing said envelope in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State.

Dated: New York, New York
May 3, 2007

S A K K A S & C A H N , L L P



By: _____

MATTHEW SAKKAS, ESQ.
Attorney for Plaintiff
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PURSUANT TO RULE 16(b)**

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